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12 *Attorneys for RGS Financial, Inc.*

9
10 IN THE UNITED STATE DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA

12 ***

13 JOSEF GUTTMANN, an Individual

14 Case No.:

15 Plaintiff

16 **DEFENDANT RGS FINANCIAL,
17 INC.'S NOTICE OF REMOVAL**

18 -against-

19 RGS FINANCIAL, INC.,

20 Defendant.

21 COMES NOW, Defendant RGS FINANCIAL, INC. ("RGS") by and through its counsel of
22 record, the law firm of Alverson Taylor & Sanders, and files its *Notice of Removal* as follows:

23 1. Plaintiff JOSEF GUTTMANN served RGS with his state-court Complaint on January
24 19, 2021 in the Justice Court, Las Vegas Township, Clark County, Nevada located at 200 Lewis
25 Ave, Las Vegas, NV 89101.

26 2. This is a civil action based on Plaintiff's contention that Defendant violated the Fair
27 Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA"). This case is still pending in
28 state court.

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3. Removal is proper because this case involves a federal question—an alleged violation of the FDCPA. This entire suit is removable under 28 U.S.C. § 1441(a).

4. Venue is proper in this district under 28 U.S.C. 1441(a) because the state court where the suit has been pending is located in this district.

5. Removal is timely pursuant to 28 U.S.C. § 1441(b) because RGS has filed its *Notice of Removal* within 30 days of receipt of Plaintiff's state-court Petition.

6. Pursuant to U.S.C. § 1441(a), a copy of all process, pleadings, documents, and orders in this case have been attached as **Exhibit A**.

8. A copy of this *Notice of Removal* has been sent to Plaintiff and will be filed with the clerk of the Justice Court, Las Vegas Township, Clark County, Nevada.

9. Plaintiff requested a jury trial in the state court matter.

WHEREFORE, PREMISES CONSIDERED, RGS respectfully requests that this Court assume full jurisdiction over the proceeding as provided by law.

DATED this 2nd day of February, 2021.

ALVERSON TAYLOR & SANDERS

John W.

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that I am an employee of ALVERSON TAYLOR & SANDERS and that on this 2nd day of February, 2021, I caused a true and correct copy of the foregoing attached document, **Notice of Removal**, electronically filed this 2nd day of February, 2021, to be served as follows:

■ VIA U.S. POSTAL MAIL: by placing a true and correct copy thereof enclosed in a sealed envelope with the postage thereon fully prepaid, addresses as indicated on the attached service list in the United States Mail.

SERVICE LIST

Josef Guttmann
721 Campbell Dr.
Las Vegas, Nevada 89107

Antonia. Dr. D.

**An Employee of ALVERSON
TAYLOR & SANDERS**

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